



Municipality of Anchorage



General Manager's Office

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Mayor Mark Begich

Anchorage Water & Wastewater Utility

COPY

May 30, 2006

Ms. Kaja Brix
Assistant Regional Administrator
National Marine Fisheries Service, Protected Resources Division
P.O. Box 21668
Juneau, AK 99802-1668

ATTN: Ellen Walsh

Re: Cook Inlet Beluga Whale Population

It has come to our attention that the National Marine Fisheries Service (NMFS) has received a petition from the Trustees for Alaska to list the Cook Inlet beluga whale as an endangered species under the federal Endangered Species Act (ESA). This letter is in response to the request for comments on the proposed listing.

The John M. Asplund Wastewater Treatment Facility is owned and operated by the Municipality of Anchorage, d.b.a. the Anchorage Water and Wastewater Utility (AWWU). The facility treats wastewater generated by the city of Anchorage and operates under a NPDES permit issued by the Environmental Protection Agency. The permit requires a rigorous monitoring program to ensure that the discharge does not negatively impact the receiving water, Cook Inlet.

During the development of the *Draft Conservation Plan for the Cook Inlet Beluga Whale*, discharge from wastewater treatment facilities was listed as one of many possible factors negatively impacting the beluga population, despite an absence of supporting evidence. Listing under the ESA will create obstacles to renewal of the NPDES permit and could potentially impose very serious economic burdens. AWWU wishes to take the opportunity provided by the request for comments to provide the attached technical memorandum. It summarizes the results of the last twenty years of monitoring, which demonstrates a lack of measurable impact to Cook Inlet and the beluga whale population.

Thank you for the opportunity to provide comments.

Sincerely,

Mark Premo, P.E.
General Manager

Attachment:

Community, Security, Prosperity

